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Group Limited*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Application of

TIANRUI (INTERNATIONAL) HOLDING
COMPANY LIMITED,

Applicant.

Case No. 19-mc-00545-JMF

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying declarations of James Stuart Eldridge and Keoy Soo Khim, and upon the accompanying memorandum of law, China Shanshui Cement Group Limited (“CSC”) will move this Court before the Honorable Jesse M. Furman at the United States District Court for the Southern District of New York, Courtroom 2202, 40 Centre Street, New York, New York, for an order pursuant to Federal Rule of Civil Procedure 24 permitting CSC to intervene to, *inter alia*, oppose the application made pursuant to 28 U.S.C. § 1782 (“**Section 1782**”) by Tianrui (International) Holding Company Limited (the “**Applicant**”) to obtain discovery from Citibank, N.A., the Bank of New York Mellon, Société Générale, HSBC

Bank USA, N.A., BNP Paribas USA, JPMorgan Chase Bank, N.A., Barclays Bank PLC, Deutsche Bank Trust Co. Americas, Bank of Scotia, UBS AG, Bank of America, N.A., Standard Chartered Bank, Commerzbank AG and the Clearing House Payments Company LLC (collectively, the “**Respondents**”) in connection with a lawsuit that the Applicant has commenced against CSC in the Cayman Islands.

Dated: New York, New York
December 20, 2019

Respectfully submitted,

By: /s/ Linda H. Martin

Linda H. Martin

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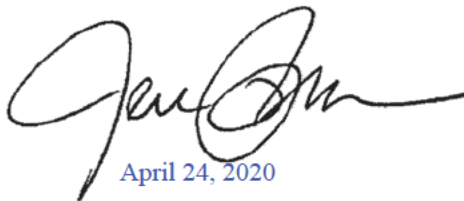
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GRANTED as unopposed. See ECF No. 59, at 2 n.3. The Clerk of Court is directed to terminate ECF No. 11.

SO ORDERED.



April 24, 2020